

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 20 CR 781-1
	)	Judge Manish S. Shah
ALEESHA McDOWELL	)	

UNOPPOSED MOTION TO ENLARGE CONDITIONS OF RELEASE ORDER

Defendant Aleesha McDowell, through her counsel, Francis C. Lipuma, herein moves this Honorable Court to allow the conditions of the pretrial release order to be enlarged. Specifically, the defendant seeks to have the freedom to travel to and from the Northern District of Indiana. In support of this motion, the defendant states as follows:

1. On November 5, 2020, a grand jury returned an indictment against Ms. McDowell and six others, and charged her with violations of 18 U.S.C. §§ 1343 and 1957(a). (Doc. 1).

2. On November 20, 2020, Ms. McDowell presented for arraignment before the Court, and entered a plea of not guilty. During that proceeding, an Order Setting Conditions of Release was entered, (Doc. 40), and the defendant was released on a \$250,000 secured bond with conditions. (Docs. 40-41, 49-50). Among the conditions set forth in the pretrial release order is a travel restriction limiting the defendant's movements to the Northern District of Illinois. (Doc. 40).

3. Ms. McDowell respectfully seeks to enlarge the conditions of her pretrial release to allow her to travel to and from the Northern District of Indiana. She has lived on the South Side of Chicago as well as in the southern suburbs most of her life. She has relationships with people who live in the Northern District of Indiana to include family members and friends, and she would like to be able to continue to visit them. She also does some shopping in that district because the costs of certain items are generally less expensive there.

4. Ms. McDowell has been in compliance with the conditions of release as set forth in the Order Setting Conditions of Release.

5. This motion and the relief requested in it were brought to the attention of Matthew J. Hernandez, one of the Assistant U.S. Attorneys charged with the responsibility of prosecuting this case, and Tiffany A. Minarik, the U.S. Pretrial Services Officer charged with supervising the defendant while on pretrial release. Both graciously voiced no opposition to this motion on behalf of their offices.

6. The defendant will continue to fully comply with the conditions of her release.

Wherefore, defendant Aleesha McDowell respectfully requests this Honorable Court to enlarge the conditions of her pretrial release to allow her the freedom to travel to and from the Northern District of Indiana.

Respectfully submitted,

Aleesha McDowell

s/ Francis C. Lipuma  
Francis C. Lipuma  
Attorney for Defendant  
Aleesha McDowell

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CERTIFICATE OF SERVICE

I, Francis C. Lipuma, an attorney, do hereby certify that I caused a copy of “Unopposed Motion to Enlarge Conditions of Release Order” to be served upon:

Matthew J. Hernandez  
U.S. Attorney’s Office  
219 South Dearborn Street  
Chicago, IL 60604

Tiffany A. Minarik  
U.S. Pretrial Services Office  
219 South Dearborn Street  
Chicago, IL 60604

pursuant to Fed.R.Crim.P. 49, Fed.R.Civ.P. 5, L.R. 5.5, and the General Order on Electronic Case Filing of the United States District Court for the Northern District of Illinois, Eastern Division.

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